

MIDDLEBROOKS SHAPIRO, P.C.
ATTORNEYS AT LAW
841 MOUNTAIN AVENUE, FIRST FLOOR
SPRINGFIELD, NEW JERSEY 07081
TELEPHONE (973) 218-6877
TELECOPIER (973) 218-6878
EMAIL: MIDDLEBROOKS@MIDDLEBROOKSSHAPIRO.COM

MELINDA D. MIDDLEBROOKS, ESQ.*
JOSEPH M. SHAPIRO, ESQ.°
RICHARD P. SHAPIRO, ESQ. (1942-2002)
~
JESSICA M. MINNECI, ESQ.
ANGELA NASCONDIGLIO STEIN, ESQ.°

OF COUNSEL
MYRON S. LEHMAN, ESQ. (1928-2007)

*Also admitted in Tennessee
°Also admitted in New York

September 3, 2021

VIA CM/ECF

The Honorable Vincent F. Papalia
United States Bankruptcy Court
Martin Luther King, Jr. Federal Building
50 Walnut Street
Newark, New Jersey 07102

Re: Kevin O. O'Keefe and Mary C. O'Keefe,
17-12206-VFP

Dear Judge Papalia:

As Your Honor is aware, this Firm represents Kevin O. O'Keefe and Mary C. O'Keefe, Chapter 13 Debtors in the above-captioned matter. On August 20, 2021, the Trustee filed a Certification of Default regarding the Debtors delinquency on Chapter 13 plan payments. *See*, Docket No. 211.

Today, on September 3, 2021, Mary C. O'Keefe represented to our office that she has created a tfs bill pay account to pay the delinquency. We reasonably anticipate that the Debtors will cure the delinquency prior to a hearing return date.

Should Your Honor have any questions, please do not hesitate to contact the undersigned.

Respectfully submitted,

/s/ Jessica M. Minneci
Jessica M. Minneci, Esq.

cc: Kevin O. O'Keefe and Mary C. O'Keefe

*We are a debt relief agency.
We help people file for bankruptcy relief under the Bankruptcy Code.*